

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERUBY ABREGO,)	
Plaintiff,)	
)	
v.)	No. 23-cv-01740
)	
REYNALDO GUEVARA, GERI LYNN)	Hon. Steven C. Seeger
YANOW, as special administrator of the)	
ESTATE OF ERNEST HALVORSEN,)	
ANTHONY WOJCIK, DANIEL ENGEL,)	
JEROME BOGUCKI, RAY SCHALK,)	
FRANK CAPPITELLI,, the CITY OF)	
CHICAGO, ANDREANA TURANO)	
MICHIELS, and COOK COUNTY,)	
Defendants.)	

**TURANO’S MOTION TO DISMISS PLAINTIFF’S
AMENED COMPLAINT PURSUANT TO RULE 12(b)(6)**

NOW COMES defendant, former Assistant State’s Attorney and current Cook County Circuit Judge, ANDREANA TURANO MICHIELS (“Turano”), by and through her attorneys, Tribler Orpett & Meyer, P.C., and submits this motion to dismiss Plaintiff’s Amended Complaint pursuant to Fed. Rule Civ. Pro. 12(b)(6). In support thereof, Turano incorporates herein her accompanying Memorandum of Law in Support of Dismissal.

Respectfully submitted,

s/ William B. Oberts _____
Special State’s Attorney for
defendant, Andreana Turano

William B. Oberts - #6244723
Kevin C. Kirk - # 6329937
Tribler Orpett & Meyer, P.C.
225 W. Washington St., Suite 2550
Chicago, IL 60606
(312) 201-6400
wboberts@tribler.com
kckirk@tribler.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Defendant Turano's Motion to Dismiss Plaintiff's Amended Complaint was served upon:

Attorneys for Plaintiff

Jonathan I. Loevy
Anand Swaminathan
Arthur R. Loevy
Carla Agbiro Linton
Renee Spence
Steven Edwards Art
Loevy & Loevy
311 N. Aberdeen 3rd FL
Chicago, IL 60607
(312)243-5900
jon@loevy.com
anand@loevy.com
arthur@loevy.com
agbiro@loevy.com
spence@loevy.com
steve@loevy.com

Attorneys for Cook County

Kelli Huntsman
Cook County State's Attorney's Office
Civil Actions Bureau
500 Richard J. Daley Center
Chicago, IL 60602
312-603-3151
kelli.huntsman@cookcountyil.gov

Attorneys for Anthony Wojcik, Jerome Bogucki, Ray Schalk, Daniel Engel

James G. Sotos
Josh M. Engquist
Joseph M. Polick
Maurice Hunt
Thomas J. Sotos
Elizabeth R. Fleming
The Sotos Law Firm, P.C
141 W. Jackson Blvd., #1240A
Chicago, IL 60604
jsotos@jsotoslaw.com
jengquist@jsotoslaw.com
jpolick@jsotoslaw.com
mhunt@jsotoslaw.com
efleming@jsotoslaw.com
tsotos@jsotoslaw.com

Attorneys for defendant, City of Chicago

Eileen E. Rosen
Andrew J. Grill
Austin G. Rahe
Catherine M. Barber
Jessica Zehner
Lauren M. Ferrise
Theresa B. Carney
Rock Fusco & Connelly LLC
321 N. CLARK STREET, SUITE 2200
Suite 2200
Chicago, IL 60654
312-494-1000
erosen@rfclaw.com
agrill@rfclaw.com
arahe@rfclaw.com
cbarber@rfclaw.com
jzehner@rfclaw.com
lferrise@rfclaw.com
tcarney@rfclaw.com

Attorneys for Reynaldo Guevara

Steven B. Borkan
Timothy P. Scahill
Graham P. Miller
Misha Itchhaporia
Emily E. Schnidt
Molly Boekeloo
Whitney Newton Hutchinson
Borkan & Scahill, Ltd.
20 S. Clark Street, Suite 1700
Chicago, IL 60603
(312) 580-1030
sborkan@borkanscahill.com
tscahill@borkanscahill.com
[gmiller@borkanscahill.com](mailto:gmler@borkanscahill.com)
mitchhaporia@borkanscahill.com
whutchinson@borkanscahill.com
eschnidt@borkanscahill.com
mboekeloo@borkanscahill.com

service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5 as to any party who is not a Filing User or represented by a Filing User by mailing a copy to the above-named attorney or party of record at the address listed above, from 225 W. Washington Street, Suite 2550, Chicago, IL 60606, prior to 5:00 p.m. on the 5th day of September, 2023, with proper postage prepaid.

s/ William B. Oberts
an Attorney